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Hon. Marina C. Mundy, JSC  
26 Central Avenue  
Staten Island, NY 10301

RE: William Nolan, People v. Nolan Ind. 623/18, 225c/2020

Dear Justice Mundy:

I represent William Nolan in the above matters. Mr. Nolan has contacted me regarding the actions and behavior of Jose Rodriguez, one of the complaining witnesses in action 225c/2020. Mr. Rodriguez has an order of protection against Mr. Nolan arising from allegations contained in docket 225c/2020. Mr. Nolan has, on frequent occasions since the issuance of the order of protection, observed Mr. Rodriguez in the vicinity of Mr. Nolan's residence, Mr. Nolan's brother's residence, Mr. Nolan's vehicle/person. Mr. Nolan has documentation of several of these occurrences.

This information is being brought to your attention for two reasons:

1. Mr. Nolan has a court-ordered order of protection against him in favor of Mr. Rodriguez;

While it is understood that the order of protection does not restrict Mr. Rodriguez' movements, if, in fact, Mr. Rodriguez needs an order of protection, logic should suggest that Mr. Rodriguez would avoid Mr. Nolan to alleviate any possible contact or interaction with him. Mr. Rodriguez is aware of the location of Mr. Nolan's residence and Mr. Nolan's vehicle, yet he still appears on Mr. Nolan's residential street and around Mr. Nolan's vehicle. Mr. Nolan has lawfully abided by the order of protection and will continue to do so.

2. Mr. Nolan fears for his personal safety based upon Mr. Rodriguez' behavior, but is reluctant to report the incidents to the NYPD due to the charges in the present case.

Based upon these interactions, Mr. Nolan is fearful that Mr. Rodriguez, in possession of an order of protection, has become more and more brazen in approaching Mr. Nolan's residence and vehicle to the point where it has approached stalking. The present allegations against Mr. Nolan generated by the NYPD have, in Mr. Nolan's perspective, made it impossible

for him the call 911 or have the NYPD respond to him. He has asked me to intervene on his behalf, and I am making the Court aware of the circumstances and situation. I am exploring the possible procedures of making a police report in Mr. Nolan's place.

Very truly yours,  
*Matthew Santamauro*  
Matthew Santamauro

Matthew J. Santamauro